

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	CHAPTER 13
CHERIE LYNISE IRBY	
fka Cherie Lynise Jackson	CASE NO. 1:14-bk-05756
Debtor	
US BANK NATIONAL ASSOCIATION,	
not in its individual capacity but solely as	
trustee for the RMAC Trust, Series 2016-	
CTT c/o Rushmore Loan Management	
Services,	
Movant	
v.	
CHERIE LYNISE IRBY	
fka Cherie Lynise Jackson,	
Respondent	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Proof of default is demanded at trial and this paragraph is therefore denied. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.
8. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
9. Proof of current value of collateral is demanded at trial and this paragraph is therefore denied.

10. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.

11. Denied that Movant has demonstrated cause for relief from stay .

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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